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September 27, 2021

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: Lawrence v. Northwell Health, Inc., 19 cv. 7448 (KMK)(JCM)

Dear Judge Karas,

I represent plaintiff in this matter and am prepared to file opposition papers to defendant's motion for summary judgment today. Attached to our papers and discussed at some length therein are the disciplinary records of two Caucasian comparator physicians.

I received these documents pursuant to a court order of Judge McCarthy and believe these documents should be filed under seal to preserve certain information which may be damaging to one or both of these doctors.

I would also respectfully submit that the brief, Rule 56.1 Reply and Counter-statement which extensively discuss the comparators, also be filed under seal as well and request leave of the court to so proceed.

Yours respectfully,

  
Michael H. Sussman

cc: Mr. Stoler, Esq. by ECF

Granted.

So Ordered.

  
9/27/21